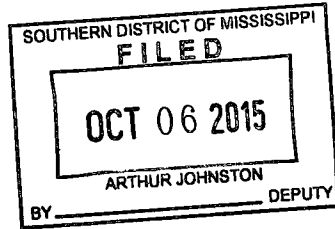


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

ERICA WHITE



CRIMINAL NO. *5:15-cr-00004-DCB-FKB*

18 U.S.C. § 641

The Grand Jury charges:

Beginning in or about December 2009, and continuing until in or about April 2014, in Jefferson County, in the Western Division of the Southern District of Mississippi and elsewhere, the defendant, **ERICA WHITE**, aided and abetted by others known and unknown to the Grand Jury, did steal, purloin and knowingly convert to her own use, greater than \$1,000.00 in funds belonging to the United States of America, namely, approximately \$86,281.30 in funds administered by the Department of Veterans Affairs in the form of Veteran Affairs Dependency and Indemnity Compensation benefits, which funds the defendant knew she was not entitled to receive.


All in violation of Sections 641 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offense. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed

beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury.

S/SIGNATURE REDACTED

returned in open court by the foreperson or deputy foreperson of the

OCTOBER, 2015


UNITED STATES MAGISTRATE JUDGE